

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION**

**GILBERTO GOMEZ VICENTE, et  
al.,**

*Plaintiffs,*

**V.**

**UNITED STATES OF AMERICA, et  
al.,**

*Defendants.*

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**CIVIL ACTION NO. 5:20-CV-00081**

## JOINT MOTION FOR AN EXTENSION OF DEADLINE

## **JOINT MOTION FOR AN EXTENSION OF DEADLINE**

The parties jointly move the Court to extend the August 19, 2022 deadline to file closing documents in this case. As explained below, the parties have reached an agreement in principle to settlement terms in this case and have made progress in finalizing that agreement. However, more time is required to file closing documents. In further support of this request, the parties would show the Court the following:

1. The parties have agreed in principle to resolve this case. *See* Notice of Settlement, Dkt. 85.
2. The Court has established a deadline of August 19, 2022, for the parties to file closing documents that are in compliance with Fed. R. Civ. P. 41. Dkt. 87. The Court indicated that this deadline could be extended for good cause. *Id.*
3. Since agreeing to resolve this case, the parties have been working diligently to finalize a settlement agreement. For example, the government has obtained all the necessary approvals to enter into the agreement and the parties have successfully negotiated the language in

the agreement. Further, Plaintiffs have engaged in diligent and good-faith efforts to complete the necessary paperwork to finalize the agreement. The only issues that remain outstanding concern certain logistics that will allow the agreement to be fully executed. The parties anticipate that these last remaining tasks can be completed within 45 days.

For the forgoing reasons, the parties respectfully request that the Court extend the deadline for filing closing documents until September 30, 2022.

Dated: August 12, 2022

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on all counsel of record via electronic mail on this 12th day of August, 2022.

/s/ Edgar Saldivar

Edgar Saldivar